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February 5, 2002

Honorable Felix J. Boudreaux Commissioner of Conservation Post Office Box 94275 Baton Rouge, Louisiana 70804

Re:

Nonion Struma Sand, Reservoir B

Gillis-English Bayou Field Calcasieu Parish, Louisiana

Hackberry Zone, Reservoir B Gillis-English Bayou Field Calcasieu Parish, Louisiana

Pujol Sand, Reservoir B Gillis-English Bayou Field Calcasieu Parish, Louisiana

Dear Commissioner Boudreaux:

Application is hereby made on behalf Samson Resources, Inc. to the Commissioner of Conservation for the calling of a public hearing after legal notice to consider evidence relative to the issuance of orders pertaining to the following matters relative to the Nonion Struma Sand, Reservoir B, Hackberry Zone, Reservoir B, and the Pujol Sand, Reservoir B, Gillis-English Bayou Field, Calcasieu Parish, Louisiana:

NONION STRUMA SAND, RESERVOIR B

- 1. To create a single drilling and production unit for the exploration for and production of gas and condensate from the Nonion Struma Sand, Reservoir B, designated as the NS RB SUA as shown on the plat attached hereto;
- 2. To force pool and integrate all separately owned tracts, mineral leases and other property interests within the unit so created on a surface acreage basis of participation;
- 3. To allow the Commissioner of Conservation to reclassify the Reservoir by supplemental order, without the necessity of public hearing, should the producing characteristics of the reservoir change and evidence to justify reclassification is submitted to and accepted by the Commissioner of Conservation;
- 4. To consider such other matters as may be pertinent to the Nonion Struma Sand, Reservoir B.

The Nonion Struma Sand, in Gillis-English Bayou Field, Calcasieu Parish, Louisiana, was previously defined in Office of Conservation Order No. 252-GG, effective February 8, 2000.

HACKBERRY ZONE, RESERVOIR B

- 1. To create a single drilling and production unit for the exploration for and production of gas and condensate from the Hackberry Zone, Reservoir B, designated as the HBY RB SUA as shown on the plat attached hereto;
- 2. To force pool and integrate all separately owned tracts, mineral leases and other property interests within the unit so created on a surface acreage basis of participation;
- 3. To allow the Commissioner of Conservation to reclassify the Reservoir by supplemental order, without the necessity of public hearing, should the producing characteristics of the reservoir change and evidence to justify reclassification is submitted to and accepted by the Commissioner of Conservation;

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4. To consider such other matters as may be pertinent to the Hackberry Zone, Reservoir B.

The Hackberry Zone, in Gillis-English Bayou Field, Calcasieu Parish, Louisiana, was previously defined in Office of Conservation Order No. 252-FF, effective February 8, 2000.

PUJOL SAND, RESERVOIR B

- 1. To create a single drilling and production unit for the exploration for and production of gas and condensate from the Pujol Sand, Reservoir B, designated as the Pujol RB SUA as shown on the plat attached hereto;
- 2. To force pool and integrate all separately owned tracts, mineral leases and other property interests within the unit so created on a surface acreage basis of participation;
- 3. To designate a unit operator and a unit well for the unit so created;
- 4. To allow the Commissioner of Conservation to reclassify the Reservoir by supplemental order, without the necessity of public hearing, should the producing characteristics of the reservoir change and evidence to justify reclassification is submitted to and accepted by the Commissioner of Conservation;
- 5. To consider such other matters as may be pertinent to the Pujol Sand, Reservoir B.

The Pujol sand, Reservoir B, in Gillis-English Bayou Field, Calcasieu Parish, Louisiana, was previously defined in Office of Conservation Order No. 252-A-1, effective December 18, 1980.

The pre-application conference was held as scheduled. In attendance were the parties on the attached list. Mr. William S. Strain, representing Samson, opened the conference, and then turned it over to Mr. William H. Robbins, consulting geologist, who presented the geological and other bases of Samson's proposals. There then followed a period of questions and answers. Mr. Troy Freund, consulting geologist representing Bel Minerals, presented a counterplan consisting of a square unit for the Hackberry Zone, Reservoir B and the Nonion Struma Sand, Reservoir B. Mr. Victor Pernoud, representing himself, indicated that he would oppose such a counterplan.

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The conference was then adjourned, following some additional discussion. Consequently, opposition is anticipated as to the Hackberry Zone, Reservoir B and Nonion Struma Sand, Reservoir B.

Attached hereto and made a part hereof are the plats outlining the NS RB SUA the HBY RB SUA, and the Pujol RB SUA in the Gillis-English Bayou Field, Calcasieu Parish, Louisiana. Also enclosed to the Commissioner of Conservation and District Manager ONLY are a list of Interested Owners, Interested Parties and Represented Parties to whom a copy of this notice is being sent. A reasonable effort has been made to ascertain the names and addresses of all Interested Owners, Interested Parties or Represented Parties. Copies of this list will be provided upon request.

In addition to furnishing the legal notice to all Interested Owners, Represented Parties and Interested Parties, the applicant will provide for posting of the legal notice of the hearing and unit plats in a prominent place in the area of Gillis-English Bayou Field. Additionally, the legal notice will be published in a newspaper of general circulation in the vicinity of Gillis-English Bayou Field, at least fifteen (15) days before the hearing date.

All pertinent data relating to this proposed application may be obtained AT THE COST OF THE REQUESTING PARTY from William H. Robbins & Associates, 140 Rue Beauregard, Suite 100, Lafayette, Louisiana 70508-3131 (337) 232-5004.

Also enclosed is our check payable to the Office of Conservation, representing the required hearing application fee.

Very truly yours,

STRAIN, DENNIS, MAYHALL

& BATES, L.L.P.

William S. Strain

WSS:mbw ENCLOSURES

cc:

Mr. Richard Hudson District Manager Lafayette, Louisiana

Interested Owners Represented Parties Interested Parties





